

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

ARONDA PIGEON, individually and as	)	
Special Administrator of the Estate of	)	
DUSTIN PIGEON, deceased,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-18-728-J
v.	)	
	)	
KEITH PATRICK SWEENEY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DEFENDANTS CITY AND CITY'S EXPERT WITNESS LIST**

**COME NOW** Defendants, Chief William Citty and the City of Oklahoma City, and pursuant to this Court's Scheduling Order and Rule 26(b)(4) of the Federal Rules of Civil Procedure and states as follows:

These Defendants have not retained any expert for purposes of this litigation nor did it employ the following to routinely provide expert witness testimony and therefore, no report is required. To the extent a report may be required, the following testified in the criminal trial of *State v. Sweeney*, Oklahoma County District Court No. CF-2017-7236 and their testimony was recorded and has been transcribed and is available to Plaintiff and Defendant Sweeney:

No.	Witness	Address
1.	CSI Audrey Moon	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102

2.	Sgt. Christopher Click	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102
3.	CSI Paige Bradbury	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102
4.	Examiner Ronald Jones	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102

Additionally, these employees authored reports regarding the OCPD's investigation into the actions of Defendant Sweeney and Officers Nitzky and Howell in OCPD Case No. 17-092165, copies of which have already been provided to Plaintiff.

The following two employees offered testimony in the above-referenced criminal case who did not author any report, but Plaintiff and Defendant Sweeney can purchase a copy of the transcript:

No.	Witness	Address
5.	Det. John Robert High	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102
6.	Lt. Blake Webster	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102

Additionally, the following may be called as fact witnesses regarding training provided by the OCPD:

No.	Witness	Address
7.	Sgt. Travis Serna	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102
8.	Sgt. Kent Cochran	c/o Richard C. Smith Asst. Municipal Counselor 200 N. Walker, 4 <sup>th</sup> Floor Oklahoma City, OK 73102

Lastly, the following is a state employee who conducted the autopsy of Plaintiff's decedent (and her report has been furnished to Plaintiff's counsel and Defendant Sweeney's counsel) and testified in the criminal trial of *State v. Sweeney*, Oklahoma County District Court No. CF-2017-7236:

No.	Witness	Address
9.	Edana Stromberg, M.D.	921 N.E. 23 <sup>rd</sup> Street Oklahoma City, OK 73105

Respectfully submitted,

KENNETH JORDAN  
Municipal Counselor

/s/ Richard C. Smith  
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Attorneys for Defendant City and City

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of February, 2020, I electronically transmitted the attached Defendants City and City's Expert Witness List to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: HCA Legal Group, PLLC, John D. Coury, Esq., at [johndcoury@yahoo.com](mailto:johndcoury@yahoo.com), Robert W. Haiges, Esq., at [haigesr@yahoo.com](mailto:haigesr@yahoo.com), and Chris Harper, at [charper@chrisharperlaw.com](mailto:charper@chrisharperlaw.com), Attorneys for Plaintiffs, and Gary James, at [gary@garyjameslaw.com](mailto:gary@garyjameslaw.com), Attorney for Defendant Keith Patrick Sweeney .

/s/ Richard C. Smith  
Assistant Municipal Counselor